For EPA Use Only
ID# CUE 02 0026

Worksheet 6. Application Summary

This worksheet will be posted on the web to notify the public of requests for critical use exemptions beyond the 2005 phase out for methyl bromide. Therefore, this worksheet cannot be claimed as

1. Name of Applicant: Kraft Foods North America

2. Location: Three Lakes Drive, Northfield, Illinois

3. Crop: Not applicable

4. Pounds of Methyl Bromide Requested 2005 _____

5. Area Treated with Methyl Bromide 2005 _____ _____ units

6. If methyl bromide is requested for additional years, reason for request:

There are no current technically feasible or proven alternatives which would not create operational and infestation concerns to our business. The heat alternative comes at a high cost without a guarantee of short or long term success in some facilities.

2006 _____ lb.. Area Treated _____ _____ units

2007 _____ lb.. Area Treated _____ _____ units

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

Potential Alternatives	Not Technically Feasible	Not Economically Feasible	Reasons
Phosphine, carbon dioxide and heat combination	X		Elevated risk of corrosion of high technology process equipment and instruments. No studies are available to indicate that long term effects are not severely detrimental to equipment. We know that the rate of corrosion increases with each fumigation.
Heat	X can't predict the long term effects of heat. Heat gradients may result in insect survival at the floor level, resulting in structural infestations.	X	Elevated temperatures inactivate insects, however in some facilites it is not possible to achieve a uniform temperature to inactivate insects, while protecting the facility and equipment from heat stress and eventual damage. The long-term effects of heat upon our equipment and buildings are not well understood and present a significant issue. This is more apparent in large plants where significant areas with high ceiling need to be heated at the same time. We are not aware of any long term studies dealing with the effects of repeated high temperature exposure of high technology equipment, building structures, electrical systems or roofing systems. From an economic perspective, we estimate that the ongoing cost (as an expense) of using methyl bromide is a small % of the capital investment (not including expense of heat treatment) for heat treatment for the plants at issue.